

REMARKS

Reconsideration is respectfully requested.

Claim 1 has been amended to more precisely recite the subject matter that Applicants consider to comprise their invention. More specifically, the recitation of the PECVD and LPCVD processes being performed "in the same chamber" has been inserted. Support for this amendment is found at page 5, lines 16-18, and more specifically at page 14, lines 12-17. No new matter has been added.

By the amendment, the recitation of "in the same chamber" has been associated with the PECVD and LPCVD processes, thereby clearly distinguishing the prior art, both as disclosed in the application specification in the description of FIG. 1 and as disclosed in the secondary reference to Kweon et al.

It is respectfully submitted that, as amended, Claims 1-16 distinguish the prior art and the rejection based on the APA and on Kweon et al. is improper in that neither disclose or suggest the limitations now recited in Claim 1.

It is further submitted that the recited feature of the single chamber was also recited in Claim 4 and has been both searched and considered in the rejection of Claim 4. Thus, the amendment is not considered to raise new issues for consideration or search.

The rejection of Claim 4, reciting the PECVD and LPCVD processes both being performed in the "CVD chamber" is traversed because it is respectfully suggested that the reliance on the disclosure in the Description of the Related Art section, at page 5, lines 7-9, is misplaced. It is evident from both the cited description, and more evidently from the paragraph following, that is, page 5, lines 13-18, that the process illustrated in FIGS. 1A-1H does not contemplate that the PECVD and the LPCVD is done in the same chamber, but rather to the

contrary. Since the described improvement lies in the stated omission of "extra process steps ... , such as transfer from the PVD chamber to the CVD chamber." Moreover, Kweon et al. also fail to describe or otherwise suggest the recited limitation.

Because a recited element is not taught by the references relied upon in the rejection, a *prima facie* case of obviousness has not been made out, and the rejections have now been overcome.

For the above reasons, Applicants respectfully request reconsideration and withdrawal of the outstanding rejections. An indication of allowable subject matter is earnestly solicited.

Respectfully submitted,



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